EXHIBIT 6

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1   UNITED STATES DISTRICT COURT

             NORTHERN DISTRICT OF CALIFORNIA

2   SAN FRANCISCO DIVISION

3

4   _____
)

5   WAYMO LLC,   )
)

6   Plaintiff,   )
)

7   vs.   ) Case No.
) 3:17-cv-00939-WHA

8   UBER TECHNOLOGIES, INC.,   )
     OTTOMOTTO LLC; OTTO   )

9   TRUCKING LLC,   )
)

10   Defendants.   )
     _____)

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15   HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

16   VIDEOTAPED DEPOSITION OF MICHAEL JANOSKO

17   San Francisco, California

18   Thursday, March 23, 2017

19   Volume I

20

21

22

     Reported by: SUZANNE F. GUDELJ

23   CSR No. 5111

24   Job No. 2575504

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1   layer connection so that data in transit is

2   encrypted. And beyond that, I -- I'm not exactly

3   sure.

4   Q   When Tortoise SVN connects to the Waymo

5   SVN, is a local copy of the SVN downloaded onto the   03:26:24

6   computer that's accessing the Waymo SVN?

7   A   My understanding is that you can select

8   folders to replicate, and that replication includes

9   some local -- local storage.

10   Q   When you use the term "replicate," are you   03:26:53

11   referring to replicating a copy onto the local

12   computer or replicating the database -- I'm not

13   exactly sure what you mean by replicate because you

14   said it entails some local storage, implying that

15   some replication does not include local storage.   03:27:15

16   A   So I'll try to restate that. The -- my

17   understanding of how subversion clients work is that

18   you can select a source code version and separate

19   folders, individual folders or projects. I don't

20   know how they're grouped, what the terminology is.   03:27:34

21   And you choose which ones to download a local copy

22   of, and then you can modify them and then upload

23   them again. And that's how the source code

24   versioning works.

25   As you make edits and modifications, those   03:27:51

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1 position to download an entire copy of the Waymo SVN

2 repository to his local computer?

3   MR. PERLSON: And I caution you not to

4 reveal any discussions you've had with counsel in

5 answering that question.   03:38:59

6   THE WITNESS: Sure. Sure. I'm not

7 familiar enough with Anthony's role to -- to say

8 whether that was unusual or not.

9 BY MS. CHANG:

10   Q   If a Waymo employee downloads an entire   03:39:11

11 copy of the Waymo SVN repository to their local

12 computer, is that an action that would be

13 investigated by the security team at Google or

14 Waymo?

15   MR. PERLSON: Object to form.   03:40:20

16   THE WITNESS: I don't think so.

17 BY MS. CHANG:

18   Q   Why would you say "I don't think so"?

19   A   Generally the action -- so the actions

20 around data access around -- that -- that someone   03:40:48

21 has legitimate and job-related access to, those are

22 investigated when there's other evidence of -- of

23 malicious activity or -- or activity that -- that

24 feels suspect.

25   Q   Are you aware that a number of former Waymo 03:41:10

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1   Q   Are you aware of any evidence that Uber is

2   using any of Waymo's trade secrets?

3   MR. PERLSON: Objection. Form.

4   THE WITNESS: I'm not.

5   BY MS. CHANG: 03:42:27

6   Q   Are you aware of any evidence that Otto is

7   using any of Waymo's trade secrets?

8   MR. PERLSON: Objection to form.

9   BY MS. CHANG:

10   Q   And by Otto, I'm referring to Ottomotto LLC 03:42:35

11   and Otto Trucking LLC?

12   A   Right. Just circumstantial, that kind of

13   knowledge. So again, kind of via the media.

14   Q   Are you aware of any evidence that Otto is

15   using any of Waymo's trade secrets?   03:42:50

16   MR. PERLSON: Objection to form.

17   THE WITNESS: No.

18   MS. CHANG: Can we go off the record.

19   VIDEO OPERATOR: Going off the record at

20   3:43 p.m.   03:43:07

21   (Recess.)

22   VIDEO OPERATOR: We're back on the record

23   at 3:50 p.m.

24   MR. PERLSON: Before we start, can I mark

25   this transcript Highly Confidential, Attorneys' Eyes   03:50:14

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